



Mike DeWine, Governor  
Jon Husted, Lt. Governor  
Laurie A. Stevenson, Director

April 5, 2022

**Limited Environmental Review and Finding of No Significant Impact**

**West Creek Conservancy – Geauga County  
Bronson Creek Preservation Project  
WRRSP number: WR392014-0002**

**Sponsor: Northeast Ohio Regional Sewer District Westerly Chemically Enhanced High-Rate  
Treatment Project  
Sponsoring WPCLF loan number: CS391430-0138**

The attached Limited Environmental Review (LER) is for a nonpoint source project in Geauga County which the Ohio Environmental Protection Agency intends to finance through its Water Resource Restoration Sponsor Program (WRRSP). The LER describes the project, its costs, and expected environmental benefits. Making available this LER fulfills Ohio EPA's environmental review and public notice requirements for this loan program.

Ohio EPA analyzes environmental effects of proposed projects as part of its WRRSP program review and approval process. We have concluded that the proposed project should not result in significant adverse environmental impacts. This project's relatively narrow scope and lack of environmental impacts qualifies it for the LER rather than a more comprehensive Environmental Assessment. More information can be obtained by calling or writing the person named at the end of the attached LER.

Upon issuance of this Finding of No Significant Impact (FNSI) determination, award of funds may proceed without further environmental review or public comment unless new information shows that environmental conditions of the proposed project have changed significantly.

Sincerely,

*Kathleen Courtright*

Kathleen Courtright, Assistant Chief  
Division of Environmental and Financial Assistance

Attachment

## LIMITED ENVIRONMENTAL REVIEW

### **Project Identification**

WRRSP Project: Bronson Creek Preserve  
WRRSP Applicant: West Creek Conservancy  
WRRSP Number: WR392014-0002

Sponsoring Community: Northeast Ohio Regional Sewer District  
Sponsoring Project: Westerly Chemically Enhanced High-Rate Treatment  
Sponsoring WPCLF Loan: CS391430-0138

### **Project Summary**

The West Creek Conservancy seeks \$1,368,846 in funding through Ohio EPA's Water Resource Restoration Sponsor Program (WRRSP) to protect the Bronson Creek Preserve by purchasing two parcels totaling 361 acres in Montville Township, Geauga County. The project features the protection of a 336.84-acre Category 3 wetland complex that is part of a 700-acre wetland surrounding the project site. Four perennial streams totaling 9,754 linear feet are also located on the site that serve as the headwaters to Spring Creek and ultimately the Grand River (figures 1, 2, and 3).

Northeast Ohio Regional Sewer District (NEORS) will sponsor the project through a Water Pollution Control Loan Fund (WPCLF) loan administered by Ohio EPA's Division of Environmental and Financial Assistance (DEFA). Funds for the Bronson Creek Preserve project will be provided by advancing a portion of the interest to be paid by NEORS on its \$82,000,000 Westerly Chemically Enhanced High-Rate Treatment (HRT) project. This WPCLF project also plans to sponsor the remaining balance of Columbus and Franklin County Metro Parks' Clear Creek Bank Stabilization and Fish Habitat project (\$500,250), The Nature Conservancy's Morgan Swamp – Rich Addition project (\$389,450), the city of Ravenna's Wahoo Wetlands project (\$1,245,500) and the city of Warren's Water Works Dam Removal project (\$1,725,000). The NEORS project is scheduled to be awarded WPCLF funding in April 2022. By voluntarily agreeing to sponsor the Bronson Creek Preserve project, as well as the other WRRSP projects, NEORS is eligible for an up to 0.1% discount that will reduce its WPCLF loan rate.

The purpose of the WRRSP is to counteract the loss of ecological function and biological diversity that jeopardizes the health of many of Ohio's water resources. In the program, entities such as park districts and land conservancies (implementers) undertake ecologically restorative and protective projects. Borrowers from the WPCLF voluntarily sponsor such projects in return for interest rate discounts. Ohio EPA foregoes a portion of the interest that borrowers would repay to the WPCLF and advances it to implementers to carry out the ecologically beneficial projects. Properties are acquired, restored, and managed in perpetuity under a management plan and an environmental covenant, which establishes use restrictions on the land.

### **History & Existing Conditions**

The Bronson Creek Preserve project is approximately 361 acres of flat to gently rolling topography which is comprised primarily of one 336.84-acre Category 3 wetland with 9,754 combined linear feet of four tributary streams braided throughout. The wetland extends offsite in all directions and is part

of a larger, surrounding wetland complex that is over 700 acres. The wetland consists of a palustrine aquatic bed, palustrine emergent, palustrine scrub shrub, and palustrine forested vegetative communities.

The forested wetland portion supports a diversity of species and forested wetland communities. Common notable species observed onsite include royal fern (*Osmunda regalis*), drooping sedge (*Carex prasina*), large populations of cardinal flower (*Lobelia cardinalis*), bladder sedge (*Carex intumescens*), brome-like sedge (*Carex bromoides*), lake sedge (*Carex lacustris*), cinnamon fern (*Osmundastrum cinnamomea*), halberd-leaf tearthumb, (*Persicaria arifolia*), hemlock water parsnip (*Sium suave*), leafy bulrush (*Scirpus polyphyllus*), buttonbush (*Cephalanthus occidentalis*), pumpkin ash (*Fraxinus profunda*), red maple (*Acer rubrum*), and swamp white oak (*Quercus bicolor*). Glossy false buckthorn (*Frangula alnus*) is common in the understory of the forested wetland.

The submerged, emergent, and scrub-shrub marsh areas are extensive and highly diverse as well. Dominant species include yellow pond lily (*Nuphar advena*), American burr-reed (*Sparganium americanum*), soft-stem bulrush (*Schoenoplectus tabernaemontani*), a diverse sedge and spike rush assemblage (*Carex spp.*, *Scirpus spp.*, *Eleocharis spp.*, etc.), swamp loosestrife (*Decodon verticillatus*), white meadowsweet (*Spiraea alba*), and swamp rose (*Rosa palustris*). The marshy areas contain floating mats of vegetation and Sphagnum spp. accumulation. Several bog indicator species were identified onsite including prickly bog sedge (*Carex atlantica var. capillacea*), swamp loosestrife, and highbush blueberry (*Vaccinium corymbosum*). The onsite marsh contains scattered populations of purple loosestrife (*Lythrum salicaria*) and common reed (*Phragmites australis*); the common reed forms more extensive colonies in the southern part of the marsh located off the property.

The Bronson Creek Preserve project is also focused on preserving four perennial streams and two palustrine open water ponds onsite. These streams flow through the deeper parts of the wetland and provide hydrology to the wetland complex in conjunction with groundwater and precipitation. The streams serve as the primary headwaters to Spring Creek and the South Branch Spring Creek. Spring Creek is a tributary to Trumbull Creek and ultimately, the Grand River. Bronson Creek (named Spring at the confluence of the project site) has an aquatic life use category of both warmwater habitat and coldwater habitat. And the Grand River watershed, wherein the Bronson Creek Preserve property is located, is a 417.5-square-mile watershed that is a mixture of forest, agricultural uses and urban uses and is home to more than 63,000 people.

The Bronson Creek Preserve is identified as a Priority Conservation Area in the *Lower Grand River Watershed Action Plan* due to its high-quality water resources. The site makes up 50 percent of what is called the “Montville Swamp” and is home to state endangered Swamp Red Currant (*Ribes triste*), One Cone club moss (*Lycopodium lagopus*), state threatened Hobblebush (*Viburnum lantanoides*) and state potentially threatened prickly bog sedge (*Carex atlantica var. capillacea*) within the hydrologically connected complex.

### **Project Description**

The project includes the acquisition of two parcels totaling 361 acres and permanently protecting it with a WRRSP environmental covenant, including 336.84 acres of high-quality, Category 3 wetlands and 9,754 linear feet of tributary streams. Following the acquisition of the properties, West Creek Conservancy intends to encumber the parcels with an environmental covenant. The project will also include invasive species management.

## **Property Management and Maintenance**

The property will be managed as a passive-use park and for research and educational use. The property will be protected in perpetuity through use restrictions spelled out in an environmental covenant, which will be part of the deed. Above any other competing management objectives, the protection and preservation of the water resources, as specified in the environmental covenant, shall rule the management of the WRRSP-protected property.

These restrictions include:

- There shall be no agricultural, industrial commercial or residential activity undertaken or allowed.
- The property may not be divided, partitioned, subdivided or conveyed except in its current configurations.
- There shall be no buildings or other structures, including, but not limited to, billboards or advertising of any kind, camping accommodations, and mobile homes shall not be erected or placed.
- There shall be no mining, drilling, exploring for or removal of minerals, oil or gas.
- There shall be no ditching, draining diking, filling, excavating, or removal of topsoil, sand, gravel, rock or other materials, except as may be necessary for reasonable preservation, management and restoration purposes.
- There shall be no manipulation or alteration of wetlands, creeks, streams, surface or subsurface springs or other bodies of water. Reasonable alternations to surface water bodies and their associated riparian zones may be permitted for the purpose of protecting or improving water quality or aquatic habitat, upon the condition that prior to any such alterations, a plan for such activities shall be proposed in writing by the Owner or any Transferee and shall be approved by Ohio EPA or shall be approved as an amendment to the Project Management Plan.
- There shall be no open dumping.
- There shall be no building of new roads or other rights-of-way. Existing roads may be maintained but shall not be widened or improved.
- There shall be no operation of automobiles, trucks, snowmobiles, dune buggies, motorcycles, all-terrain vehicles or any other motorized recreational vehicles.
- In accordance with state regulations and as approved by Ohio EPA and authorized by the Owner, hunting and trapping may be permitted to maintain ecological balance or to protect human health and safety.
- Except in areas already identified in the Plan as being disturbed, and as may be necessary for reasonable preservation, management or restoration purposes, to protect human health and safety, or to maintain a diversity of naturally occurring habitat types and control of exotic non-native and exotic species of plants, there shall be no removal, destruction, cutting, trimming or mowing of any trees or other vegetation and no non-native species shall be introduced.

## **Implementation**

The WRRSP loan award for West Creek Conservancy's Bronson Creek Preserve project may be made possible through NEORSD's Westerly Chemically Enhanced HRT WPCLF award which is scheduled for April 2022.

## **Public Participation**

West Creek Conservancy staff members will carry out public awareness, educational outreach, and interpretation regarding the Bronson Creek Preserve project. West Creek Conservancy will publicize the project through multiple outlets to the public including posting project information on their main website ([www.westcreek.org/projects](http://www.westcreek.org/projects)) to inform the public that a new natural space is being protected because of WRRSP funding, and to educate the public about the importance of water resource protection throughout the watershed.

As part of its State Environmental Review Process, DEFA will post this LER and Finding of No Significant Impact to its web page located at:

<https://epa.ohio.gov/wps/portal/gov/epa/divisions-and-offices/environmental-financial-assistance/announcements>.

## **Conclusion**

Ohio EPA conducts environmental reviews of all projects prior to awarding WPCLF financing. The proposed project meets the project type criteria for a Limited Environmental Review (LER); namely, it is a water quality protection project consisting of non-structural practices. Furthermore, the project meets the other qualifying criteria for an LER; specifically, the proposed project:

**Will have no significant environmental effect and will require no specific impact mitigation** as the planning activities for the project identified no potential adverse impacts to the quality of the human environment or to sensitive resources such as floodplains, wetlands, state or federally designated wild, scenic or recreational rivers, riparian areas, prime or unique agricultural lands, aquifer recharge zones, archaeological or historically significant sites, air quality or threatened or endangered species. In fact, the proposed project will have beneficial environmental impacts by preserving a large, high-quality wetland and headwater streams.

**Will have no effect on high-value environmental resources** since it will protect the quality of Bronson Creek–Grand River Watershed by permanently protecting the wetland and streams on the project site.

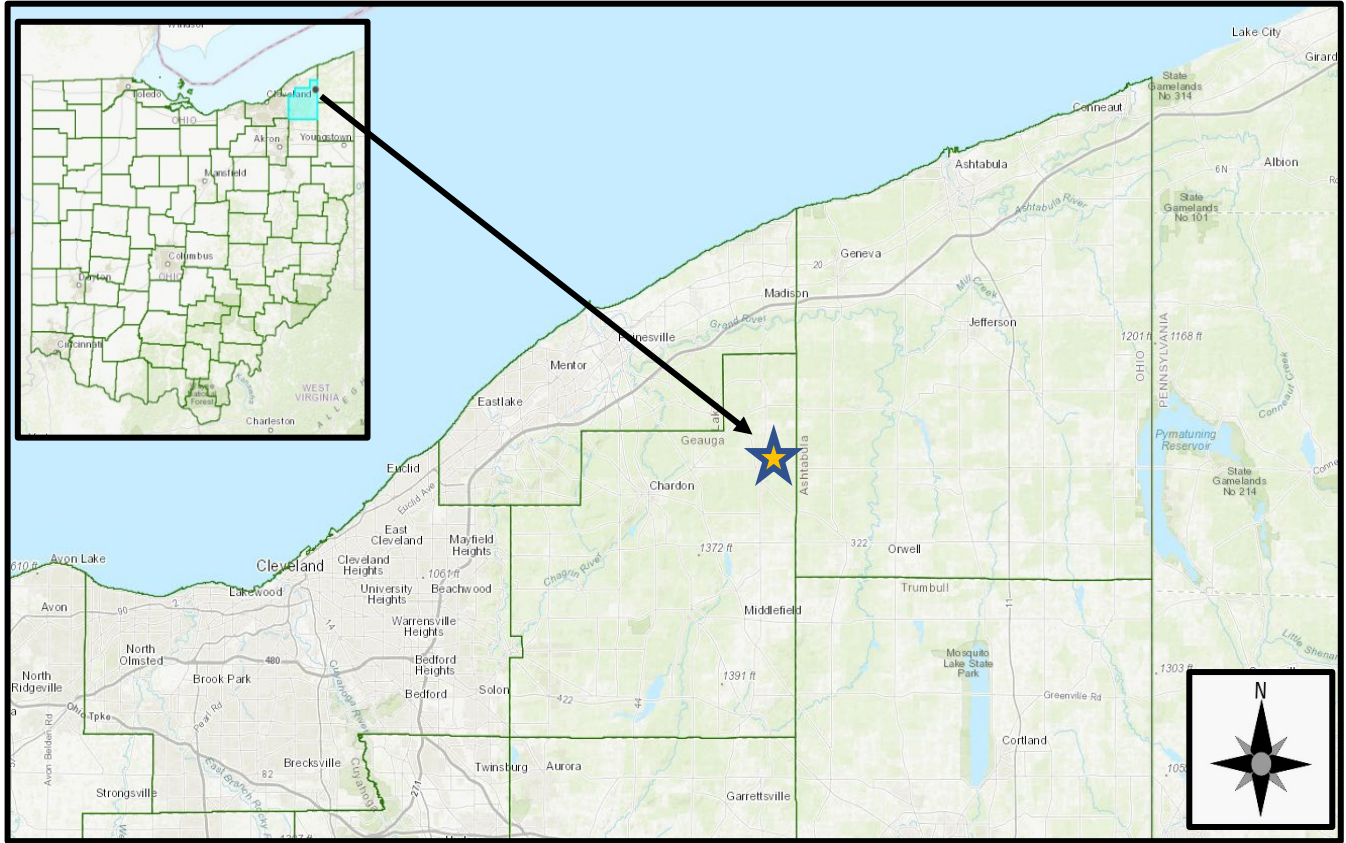
**Is not a controversial action** as it will benefit the environment and no significant public opposition has been expressed.

**Does not create a new or relocate an existing discharge to surface or ground waters** since the proposed project does not involve a point source discharge.

**Will not provide capacity to serve a population substantially greater than the existing population** since the proposed project is not a publicly owned wastewater treatment works designed to serve a designated area. Instead, it is a protection project of high-quality aquatic resources.

## **Contact information**

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Water Resource Restoration Sponsor Program, DEFA  
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**Figure 1. Project location map**



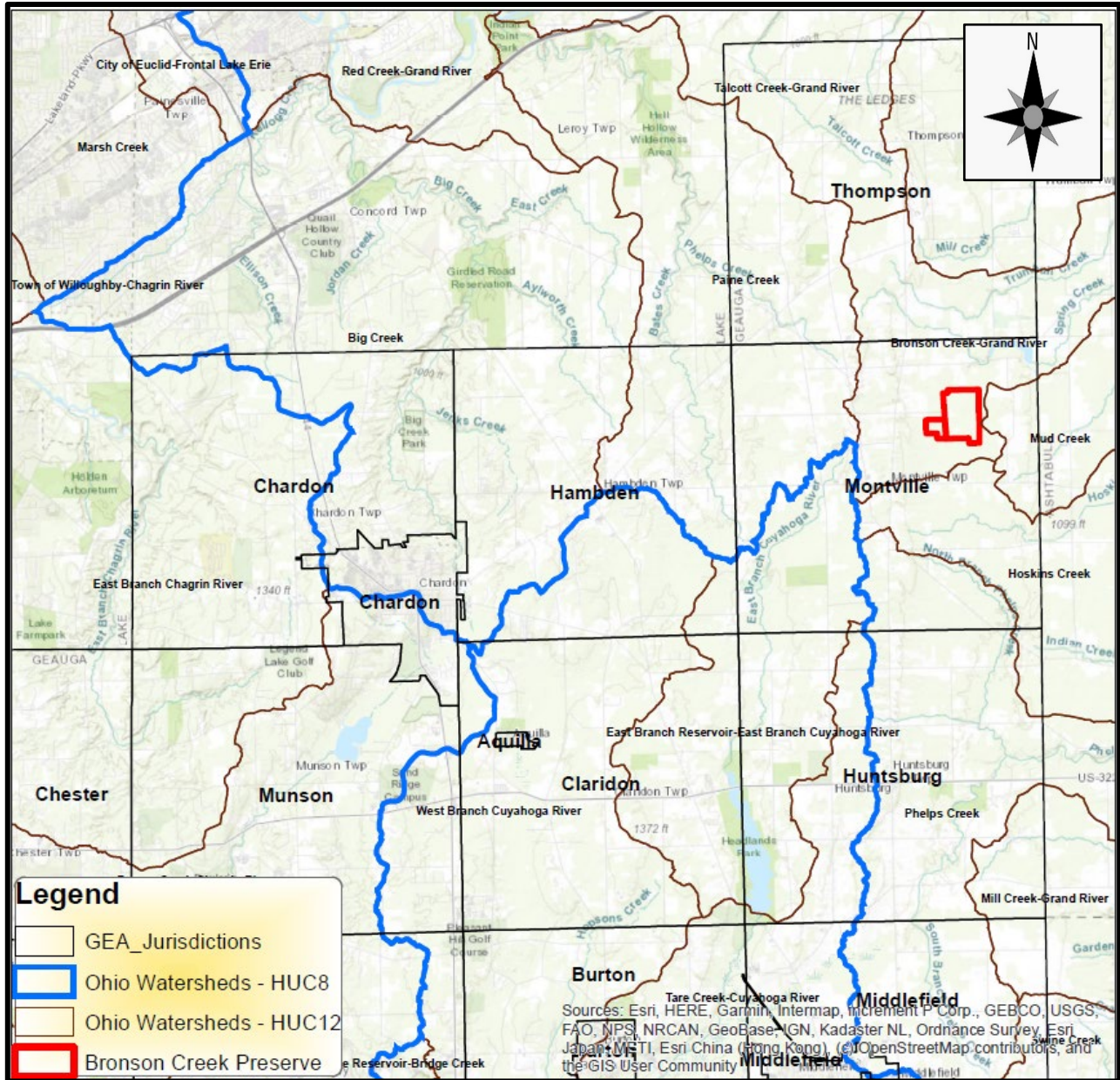


Figure 2. Project location within watershed



Figure 3. Project site aerial